

EXHIBIT B

DECLARATION OF

MICHAEL J. HUI



SILICON VALLEY
ANN ARBOR
ATLANTA
AUSTIN
BEIJING
BOSTON
LOS ANGELES
NEW YORK
SAN DIEGO
SAN FRANCISCO
SÃO PAULO
SINGAPORE

April 4, 2025

Via Email

Terry Ahearn, Managing Counsel
Tesla, Inc.
tahearn@tesla.com

Re: Former Employment of Zhongjie “Jay” Li

Dear Terry,

I write to respond to your letter, dated March 27, 2025, which was received by Zhongjie “Jay” Li on March 31, 2025. Please direct all further communications to me at mhui@gunder.com.

Your letter contains serious allegations but lack sufficient details for Mr. Li to meaningfully respond. I encourage you to contact me so we can discuss the issues you raised in greater detail.

Very truly yours,

Michael J. Hui

Michael J. Hui
Of Counsel

MJH/jae

Joanne A. Ely

From: Joanne A. Ely
Sent: Friday, April 4, 2025 4:01 PM
To: tahearn@tesla.com
Cc: Michael J. Hui
Subject: Former Employment of Zhongjie "Jay" Li
Attachments: Proception Inc. - Response to T. Ahearn Letter.pdf

Hi Mr. Ahearn,

Please find the attached correspondence from Michael Hui regarding the above-referenced matter.

Best,

Joanne

Joanne A. Ely
Legal Secretary

jely@gunder.com
Direct: 858 436 8036
Silicon Valley
gunder.com



GUNDERSON DETTMER STOUGH VILLENEUVE FRANKLIN & HACHIGIAN, LLP

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